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April 6, 2021

VIA ECF

The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

*Re: United States v. Parnas, et al., 19 Cr. 725 (S1)(JPO)*

Dear Judge Oetken:

We represent Andrey Kukushkin in connection with the above referenced matter. We write with the **consent** of the government to respectfully request that cash bail posted on Mr. Kukushkin's behalf by his father, Felix Kukushkin, be formally assigned to Gerald B. Lefcourt, P.C. in order to secure legal fees in the defense of this prosecution.

By way of background, Mr. Kukushkin appeared before this Court for arraignment on October 17, 2019, at which time he was released upon the signing of a \$1 million appearance bond, which was secured by \$100,000 in cash, real property, and co-signed by three financially responsible persons. Additional conditions of his release were set. Mr. Kukushkin has been fully compliant with the terms of his release and many of the most onerous now have been modified or eliminated, including home confinement and location monitoring.

The defense of this action has been costly. Mr. Kukushkin would like to continue his representation by the undersigned, however, his only means of doing so is to have the \$100,000 cash posted by his father assigned to the Firm. The government has **no objection** to the assignment and Felix Kukushkin has **agreed** to the assignment as well as executed a formal

The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
April 6, 2021  
Page 2

assignment reflecting same. *See* Exhibit A. The Southern District Clerk's Office, however, requires a formal court order to effectuate the agreed-to assignment.

Accordingly, **with the consent** of the government and Felix Kukushkin, Mr. Kukushkin respectfully requests that the Court enter the annexed Order assigning the \$100,000 posted by his father to Gerald B. Lefcourt, P.C. and authorizing its refund to Gerald B. Lefcourt, P.C. at such time as those funds are exonerated, released and/or ordered returned by the Court.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

/s/ Gerald B. Lefcourt  
Gerald B. Lefcourt

cc: All counsel (via ecf)